

EXHIBIT 66

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SERVICIOS FUNERARIOS GG, S.A. DE
C.V.,

Plaintiff,

v.

ADVENT INTERNATIONAL
CORPORATION.,

Defendants,

And

ADVENT INTERNATIONAL
CORPORATION,

Counterclaim-Plaintiffs,

v.

SERVICIOS FUNERARIOS GG, S.A. DE
C.V.,

Counterclaim-Defendant.

C.A. No. 23-cv-10684-IT

**THIRD PARTY GONZALO PEDRO ROBINA IBARRA’S OBJECTIONS AND
RESPONSES TO ADVENT INTERNATIONAL CORPORATION’S SUBPOENA TO
TESTIFY AT A DEPOSITION IN A CIVIL ACTION**

Pursuant to Rule 45 of the Federal Rules of Civil Procedure, Third Party Gonzalo Pedro Robina Ibarra (“Robina”) provides his objections and responses to Advent International Corporation’s (“Advent International”) Subpoena to Gonzalo Pedro Robina Ibarra to Testify at a Deposition in a Civil Action (the “Subpoena”).

OBJECTIONS

1. Robina objects to the subpoena for lack of proper service pursuant to FRCP 45(b). Robina provides these responses and objections provisionally, and reserves all rights to challenge the purported method of service.

2. Robina objects to the subpoena for failure to comply with the geographic

limitations of FRCP 45(c).

3. Robina objects to the subpoena for lack of personal jurisdiction.

4. Robina objects to the subpoena for failure to provide sufficient time to comply.

5. Robina objects to the subpoena as unnecessarily onerous and unduly burdensome for a non-party and as exceeding permissible discovery. Advent International has failed to take reasonable steps to avoid imposing undue burden and expense on a person subject to the subpoena.

6. Robina objects to the subpoena to the extent it attempts to impose any obligation contrary to or broader than required by the Federal Rules of Civil Procedure or the Local Rules of the applicable courts.

7. Robina objects to the subpoena to the extent it attempts to impose any obligation contrary to or broader than required by applicable law, including Mexican law.

8. The objections set forth in these responses are not necessarily comprehensive, and Robina reserves the right to amend or supplement these responses should additional or different information become known to him, whether through discovery, further investigation, or otherwise. Furthermore, by notifying you of these objections, Robina does not waive his right to seek to quash or modify the subpoena or to obtain any other relief to which he may be entitled.

Dated: November 28, 2023

SUSMAN GODFREY L.L.P.

/s/ Jacob W. Buchdahl

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CERTIFICATE OF SERVICE

I hereby certify that on November 28, 2023, copies of the foregoing were caused to be served upon the following via electronic and first-class mail:

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